



Amy G. Rabinowitz  
Counsel

November 2, 2001

**By Electronic Filing and Hand**

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station, 2nd Floor  
Boston, MA 02110

Re: Bay State Gas Company; D.T.E. 01-75

Dear Secretary Cottrell:

I am enclosing for filing Massachusetts Electric Company's Petition for Limited Participant Status in the above-captioned proceeding.

Thank you very much for your time and attention to this filing.

Very truly yours,

Amy G. Rabinowitz

cc: John Geary, Hearing Officer  
Kevin Brannelly, Director of Rates and Revenue Requirements  
Joseph Rogers, Office of the Attorney General  
William D. MacGillivray, Esq.  
John DeTore, Esq.

**COMMONWEALTH OF MASSACHUSETTS  
BEFORE THE  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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BAY STATE GAS COMPANY

D.T.E. 01-75

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**PETITION FOR LIMITED PARTICIPATION STATUS OF  
MASSACHUSETTS ELECTRIC COMPANY**

Massachusetts Electric Company (“MEC” or the “Company”) hereby submits this petition to the Department of Telecommunications and Energy (“Department”) for permission to participate as a limited participant in the above-captioned proceeding, pursuant to 220 CMR 1.02(1)(e). The Company states the following in support of its petition:

- 1 MEC is a Massachusetts electric company subject to the regulatory jurisdiction of the Department with a principle place of business at 55 Bearfoot Road, Northborough, Massachusetts 01532.
2. MEC provides electricity service to customers in 168 cities and towns in Massachusetts.
3. MEC is a participant in the National Grid USA money pool, as authorized by Department orders dated March 27, 1981 (D.P.U. No. 589) and March 26, 1982 (D.P.U. No. 589-A). The terms of the National Grid USA money pool have been amended several times since 1982, which the Department approved by orders dated March 30, 1983 (D.P.U. No. 589-B); October 17, 1986 (D.P.U. 86-175); January 18,

1989 (D.P.U. 88-166); February 27, 1992 (D.P.U. 91-133); October 10, 1995 (D.P.U. 95-67); and March 14, 2000 (D.T.E. 99-47).

4. On October 12, 2001 the Department issued an Order of Notice stating that any person wishing to participate in the above-captioned proceeding must file a petition with the Department by November 2, 2001

5. In conducting adjudicator hearings, the Department may “allow any person showing that he may be substantially and specifically affected by the proceeding to intervene as a party in the whole or any portion of the proceeding, and allow any other interested person to participate by presentation of argument orally or in writing, or for any other limited purpose” as the Department may order. *See* G/L. c. 30A, §10, cl. (4); see also 220 CMR 1.03(1)(b).

6. MEC has a substantial and specific interest in intervening in this proceeding because Bay State Gas Company’s filing addresses issues relating to the Department’s authorization of moneypools pursuant to Mass. Gen. Laws c. 164 §17A. Many of the issues raised in Bay State Gas Company’s proceeding may be similar to the issues raised in proceedings concerning the National Grid USA money pool. Accordingly, any decision by the Department in this proceeding may substantially and significantly affect MEC.

7. MEC, therefore, has a significant interest in the outcome of this proceeding and wishes to protect its interests and the interests of its customers by participating herein. No other party can adequately represent MEC in the proceeding.

8. Department precedent supports the participation of regulated utilities in regulatory proceedings of other utilities when important policy matters of significant precedential value are under review. *Massachusetts Electric Company*, D.T.E. 98-69 (review of alternative streetlighting tariff); *Boston Edison Company*, D.T.E. 97-86 (sale of electric generating plants); *Massachusetts Electric Company*, D.P.U. 96-25 (review of electric restructuring settlement); *Boston Gas Company*, D.P.U. 96-50 (review of performance-based ratemaking proposals); *Cambridge Electric Light Company/Commonwealth Electric Company*, D.P.U. 91-234-A (integrated resource management proceeding); *NYNEX*, D.P.U. 94-50 (alternative regulation/performance-based regulation plan).

9. Given its position as a Massachusetts regulated utility, MEC may have information that will aid the Department in its evaluation of this proceeding.

10. Given the above, MEC is “substantially and specifically affected” by these matters as set forth in the General Laws and the Department’s regulations.

11. MEC requests that all notices, testimony, pleadings and correspondence pertaining to this proceeding be directed to the persons identified below

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25 Research Drive  
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12. In the event that MEC is granted limited intervention status, MEC will accept whatever procedural schedule is proposed, and does not intend to burden the record in this proceeding.

WHEREFORE, MEC respectfully requests that the Department allow its petition for limited participation status in this proceeding.

Respectfully submitted,

MASSACHUSETTS ELECTRIC COMPANY  
By its attorney,

  
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Amy G. Rabinowitz  
25 Research Drive  
Westboro, MA 01582

Dated: November 2, 2001